

## Appendix I

TNRCC Letter  
September 24, 2001

Robert J. Huston, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
John M. Baker, *Commissioner*  
Jeffrey A. Saitas, *Executive Director*



## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

September 24, 2001

Ms. Lisa Lawson  
Project Manager  
Department of the Army  
U.S. Corps of Engineers, Tulsa District  
1645 South 101<sup>st</sup> East Avenue  
Tulsa, OK 74128-4609

**CERTIFIED MAIL #5753**  
**RETURN RECEIPT REQUESTED**

RE: Comments and Notice of Deficiency  
Expanded Site Investigation, dated January 16, 2001 (ESI)  
Former Atlas Missile Site No. 7, Vernon, Texas  
TNRCC Facility ID No. T1641

Dear Ms. Lawson:

The Texas Natural Resource Conservation Commission (TNRCC) has received the above referenced ESI received in our offices on April 19, 2001 under a cover letter dated April 16, 2001. Based on our review, the TNRCC cannot approve the ESI at this time. Please submit a revised report which addresses the enclosed comments and deficiencies.

An original and one copy of the written response to these comments and deficiencies must be submitted to the TNRCC at the letterhead address using mail code number MC-127. An additional copy should be submitted to the TNRCC Region 3 Office in Abilene.

Due to concerns for groundwater contamination, the TNRCC is requesting expedited reporting of groundwater sampling results and a schedule for additional site characterization. The deadlines are provided in the enclosure. The facility name, location and identification number(s) in the TNRCC reference line above should be included in your response.

Please note that it is the continuing obligation of persons associated with a site or facility to ensure that industrial solid wastes and/or municipal hazardous wastes are managed in such a way that it does not cause a discharge of wastes or an imminent threat of discharge, nor a nuisance or an endangerment to either human health or the environment as required by 30 TAC §335.4. Be advised that the burden remains upon the owner/operator to take necessary and authorized action to correct such conditions whenever they exist.

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ENCLOSURE  
TNRCC Facility ID No. T1641

Comments and Deficiencies  
Expanded Site Investigation, dated January 16, 2001 (ESI)  
Atlas Missile Site No. 7

1. Non-residential land use and cleanup standards for the former missile site are acceptable to the TNRCC if the current owners and lessees give their concurrence in writing. The ESI indicates that the site is currently owned by the Northside Independent School District No. 905 of Vernon, Texas. The school district reportedly allows other organizations to use the site; however, the ESI does not indicate whether the other organizations are lessees. Regardless, the TNRCC requires that owner/operators agree in writing with any closure/remediation standard in excess of Risk Reduction Standard 1 (RRS 1, background/PQL) and a non-residential land use.
2. We agree with the conclusion on page 5-11 that additional testing to establish background is appropriate. In fact, background must be established for both soils and groundwater.

As stated in the June 28, 2000 TNRCC Interoffice Memorandum, background must be set site-specifically. The background soil values listed in the Texas Risk Reduction Program (TRRP, 30 Texas Administrative Code (TAC) § 350) cannot be used at a site closing under the Risk Reduction Rules (RRR, 30 TAC §335, Subchapter S). Use of the background values listed in the table is for sites closing under the Risk Reduction Rules (RRR) that cannot establish site-specific background because all soils have been impacted by site activities. That is not the case at this site.

3. The extent of contamination in excess of background or Practical Quantitation Limits (PQL) must be defined under the RRR. The owner/operators and the TNRCC may accept that the entire site has been impacted; however, USACE must still establish that Constituents of Concern (COC) do not extend off-site in excess of background/PQL without consent of the adjacent landowner.
4. PQLs are still in excess of health-based limits for some constituents, particularly benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene. These COCs were seen in borehole BH07-S-00 in excess of the Method Detection Limit (MDL) and RRS 2 values. Other sample results were not reported down to the MDL as discussed in the TNRCC's last letter (screening procedure). As a result, the USACE cannot verify that the site meets the cleanup criteria for these COCs unless the lab still can provide estimated analytical results down to the MDL.

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Regardless, the USACE must continue to test for the SVOCs listed in the Appendix H.2 table using analytical methods capable of attaining the lowest PQL possible. (See next Comment.)

5. In addition to the constituents listed as detected in soils on page 5-3, the USACE must define the extent of any COC in excess of RRS 1.
6. The extent of groundwater contamination, particularly TCE in the upper aquifer, is essential for compliance. The USACE must drill additional wells upgradient and downgradient of MW-08 to find not only the downgradient extent, but also the source of the contamination. The nearby cooling towers are an unlikely source for significant VOCs.
7. The deep well must be downgradient of the missile silo to provide any significant conclusions regarding the potential releases from the bottom of the silo. Geologic and hydrogeologic literature may present local groundwater flow trends for the San Angelos Formation (deep aquifer). It is likely even the deep aquifer is influenced by the Red River a few miles to the north.
8. The TNRCC suggests that the USACE consider leachate tests to determine site-specific soil to groundwater protection values (GWP), in accordance with 30 TAC §335.559(g).
9. Please conduct a survey of all wells within one half mile of the site. The survey should describe the location, well owners, well construction details, depth of well and screened interval(s), producing aquifer(s), and current status of the well. A map depicting the well locations should accompany the report.
10. Please depict the former missile site's drinking water supply well on subsequent maps, including all groundwater related maps. In addition, please indicate what the status of the well is.
11. The discovery of 140 micrograms per liter (ug/l) TCE in the upper aquifer is a very significant finding, particularly when the aquifer is a major drinking water supply for the area with wells at or near the site. Because of the potential immediate impact to human health and the environment, the TNRCC is requesting the following quick action:
  - a. Immediately begin quarterly sampling of existing wells.
  - b. Immediately sample any water supply wells for the site or immediately downgradient from the site.


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- c. Report groundwater sampling results to the TNRCC within 7 days of receipt of the laboratory results until further notice.
12. Please keep the Northside Independent School District No. 905 apprised of the situation as it develops. TCE groundwater
13. Further analyses of groundwater may be limited to those analytes previously detected in soils and groundwater and their degradation products.
14. Groundwater monitoring wells are necessary *directly* downgradient from the sources. The current monitor well array ended up being either side-gradient of upgradient of the sources. *potentially?*
15. Please submit a schedule to complete characterization of the groundwater and any groundwater contaminant plume within 45 days after receipt of the first sampling results mentioned in Comment No. 11, above. TNRCC request that USACE give this site the priority needed to quickly define any threat posed by the groundwater contamination and to implement corrective action to mitigate that threat, as necessary.
16. The septic system should be considered a source of contamination requiring characterization. Please indicate whether the system is still in use.
17. The maximum chromium concentration was reported to be only 17.9 milligrams per kilogram (mg/kg) in Table 5-1, 12.4 mg/kg in Table I-3 (Appendix I) and 124 mg/kg in Table H.1. Lead, however, was consistently reported through the report. Please study your data and report it correctly and consistently.
18. We agree with the ESIs recommendation to define the extent of contamination. However, the USACE's proposal to define the extent using process knowledge and field screening must be verified by samples and analyses of sufficient high quality.
19. The TNRCC agrees with the ESI Recommendation to include previous data in the final report. The TNRCC's limited resources constrain us from compiling data from previous reports so that the facility can fully support its work and conclusions.

Ms. Lisa Lawson  
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Questions concerning this letter should be directed to me at (512) 239-2577. When responding by mail, please submit an original and one copy of all correspondence and reports to the Corrective Action Section at Mail Code MC-127 with an additional copy submitted to the TNRCC Region 3 Office. The TNRCC Facility No. T1641 should be referenced in all submittals.

Sincerely,



Geoffrey E. Meyer, Senior Project Manager  
Team IV, Corrective Action Section  
Remediation Division  
Texas Natural Resource Conservation Commission

512-239-2577  
127

GM/gm

Enclosure

cc: Waste Program Manager, TNRCC Region 3 Office - Abilene